

Remarks

This response is submitted in response to the Final Office Action mailed March 24, 2004, to request reconsideration of the rejection of claims 1-19 as set forth therein.

The Office Action and references cited therein have been carefully reviewed. The following remarks herein are considered to be responsive thereto. Claims 1 and 3-19 remain in this application, claims 1, 16, 17, 18 and 19 have been amended by this amendment and claim 2 has been cancelled by this amendment. Reconsideration of this application is respectfully requested.

In the Official Action dated March 24, 2004, which has been made FINAL, the Examiner rejected independent claims 1, 11-14 and 16 under 35 U.S.C. §102 (e) as being anticipated by U.S. Patent No. 6,243,707 issued to Humpleman, et al. (Humpleman).

Further, the Examiner rejected claims 2, 4, 5-7, 9, 10, 17 and 18 under 35 U.S.C. §103 (a) as being unpatentable over Humpleman in view of U.S. Patent No. 6,505,348 issued to Knowles, et al. (Knowles). Claims 3 and 15 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Humpleman in view of U.S. Patent Application No. 20020073081 A1 issued to Kido. Claims 8 and 19 were rejected under 35 U.S.C. §103 (a) as being unpatentable over Humpleman.

In response, Applicants have amended independent claims 1, 16, 17, 18 and 19. Further, Applicants respectfully submit that independent claims 1, 16, 17, 18 and 19 patentably distinguish over the cited references and are allowable and that claims 3-15 are allowable at least because they depend from an allowable base claim.

In particular, claims 1, 16, 17, 18 and 19 of the present invention are being amended for clarification purposes to more accurately and definitively set forth the invention. The claims have been amended to set forth in regard to claims 1 and 19 that

the portion of the content-related information is configured to be suitable for processing by an electronic program guide of the first type and at least a second electronic program guide of a second type different than the first type. Further, claims 16, 17 and 18 has been amended to specify that the portion of the content-related information is configured to be suitable for processing by at least an electronic program guide of a first type, wherein the content-related information comprises one or more documents in an extensible markup language. Applicants respectfully submit that such features are not shown or suggested in Humpleman.

No new matter is being entered by this amendment. It is respectfully requested that this amendment could not have been earlier made as it is being made for clarification purposes, particularly in traversal of the Examiner's Final rejection of Claims 1, 16, 17, 18 and 19 as being anticipated by Humpleman.

The patent to Humpleman discloses a system and method for controlling and the command of a plurality of home devices that are connected to a home network. Accordingly, sequences of commands that are used to control a respective home device are stored as a macro by the system in order to control the home device. A user is provided with the capability of operating a single button to implement a sequence of control commands from a HTML page contained within the respective home devices that are being controlled.

As mentioned above, "each home device is associated with one or more Hypertext Markup Language (HTML) files. The HTML files define the control and command functions associated with a particular home device. Each HTML file may also contain embedded references to other HTML files (col. 6, lines 51-56)."

Acting as a client, the browser based DTV 102 “receives and interprets the HTML files associated with the home devices (acting as servers) and graphically displays the respective control and command information on its viewable display (col. 6, lines 56-60).”

In particular, Humpleman teaches that:

By conforming to the Hypertext Markup Language (HTML) and Hypertext Transfer Protocol (HTTP) Internet standards, each home device sends its custom GUI to the browser based DTV 102. The browser based DTV 102 receives the HTML files from the home devices over the home network 100 using the HTTP protocol. Each HTML file contains specific control and command information for a respective home device. The HTML files enable the browser based DTV 102 to graphically display control and command information to a user for a particular home device. Therefore, because each home device supplies its own GUI through its own HTML files to the browser based DTV 102, the browser based DTV 102 can provide a command and control interface for a home device without having to know any specific details about the particular device. This feature allows the home network 100 to contain home devices from a multitude of different manufacturers. (Col. 6, lines 61-67, col. 7, lines 1-10).

Humpleman further teaches that information contained in an EPG depends upon the particular DBSS that is used. “Therefore, in one embodiment of the invention, a process extracts the information from a particular EPG and converts it into a standard program format. The standard program format is then used to build an HTML program guide. The HTML program guide can be displayed on any browser based home device.” (Col. 23, lines 2-7)

Respectfully, Humpleman does not teach configuring at least a portion of the content-related information for consistency with corresponding portions of a reference information model thereby making the content-related information suitable for processing

by an electronic program guide of a first type and at least a second electronic program guide of a second type different than the first type.

Humpleman teaches that all EPGs utilized within the system are converted to a standard format, wherein the converted EPG is then “used to build an HTML program guide” (col. 23, lines 3-5). Further, the “HTML program guide can be displayed on any browser based home device” (col. 23, lines 5-7). This aspect of Humpleman would appear to infer that all of the devices configured within the system utilize the same type of HTML formatted program guides and the homogeneity of the HTML program guides provides for the additional inventive functionality of allowing all of the program guides processed on networked devices to be “displayed on any browser based home device” (Id.).

Therefore, Humpleman teaches away from the concept of configuring at least a portion of the content-related information for consistency with corresponding portions of a reference information model thereby making the content-related information suitable for processing by an electronic program guide of a first type and at least a second electronic program guide of a second type different than the first type. Neither does Humpleman teach that a portion of the content-related information is configured to be suitable for processing by at least an electronic program guide of a first type, wherein the content-related information comprises one or more documents in an extensible markup language.

Therefore, it is respectfully submitted in view of the remarks presented in regard to independent claims 1 and 16 are allowable for at least the given reasons. Further, claims 3-15, which depend from claim 1, are allowable therewith at least because they

depend from an allowable base claim. Consequently, the Examiner is respectfully requested to withdraw the rejection of claims 1 and 16 under 35 U.S.C. §102(e).

With regard to the rejections of claims 17, 18 and 19 under 35 U.S.C. § 103(a), independent claims 17, 18 and 19 are not rendered obvious by the cited references because neither the Humpleman patent, the Kido patent, nor the Knowles patent, whether taken alone or in combination, teach or suggest an apparatus for processing content-related information wherein the content-related information comprises one or more documents in an extensible markup language or that a portion of the content-related information is configured to be suitable for processing by an electronic program guide of the first type and at least a second electronic program guide of a second type different than the first type as recited in independent claims 17, 18 and 19, respectively. Accordingly, claims 17, 18 and 19 patentably distinguish over the prior art and are allowable. Further, since Humpleman teaches away from the Examiner cited “multiple interactive program guides” of Knowles, there is no motivation to combine the art of the two. Consequently, the Examiner is respectfully requested to withdraw the rejections of claims 17, 18 and 19 under 35 U.S.C. § 103(a).

In view of the above, it is respectfully submitted that this application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone



conference with Applicant's attorneys would be advantageous to the disposition of this case, the Examiner is requested to telephone the undersigned.

Respectfully submitted,

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